

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS  
EASTERN DIVISION

In re:  JOANNE M. SULLIVAN,  Debtor.	Chapter 13 Case No. 16-12616
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**RESPONSE TO DEBTOR'S OBJECTION TO  
NOTICE OF PAYMENT CHANGE AND MOTION TO DETERMINE**

NOW COMES U.S. Bank Trust National Association, as Trustee of the Tiki Series III Trust as serviced by BSI Financial Services ("**U.S. Bank Trust**") and respectfully responds to the objection of Joanne M. Sullivan (the "**Debtor**") regarding notice of payment change and states:

1. On November 11, 2016 Proof of Claim No. 3 was filed by Nationstar Mortgage.
2. On or about July 20, 2018 a transfer of claim was filed with the court (Doc. 73) stating claim 3 was transferred from Nationstar to U.S. Bank Trust National Association, as Trustee of the Bungalow Series II Trust c/o BSI Financial Services.
3. On July 11, 2019 a notice of mortgage payment change was filed with an effective date of August 1, 2019. This is the notice of payment change subject to the Debtor's objection.
4. Since receiving notice of the objection, BSI Financial Services has reviewed the account and have determined that there was an error with the July 11, 2019 payment change.

5. U.S. Bank Trust shall withdraw the notice of payment change filed on July 11, 2019.
6. U.S. Bank Trust also anticipates filing a further notice of transfer of claim, which will transfer Claim 3 to U.S. Bank Trust National Association as Trustee of the Tiki Series III Trust as well as a corrected notice of payment change that will have a new payment effective November 1, 2019.

WHEREFORE, U.S. Bank Trust respectfully requests that this Court enter an order overruling the Objection and such further relief as is just and proper.

Respectfully submitted,

U.S. BANK TRUST NATIONAL ASSOCIATION, AS  
TRUSTEE OF THE TIKI SERIES III TRUST AS  
SERVICED BY BSI FINANCIAL SERVICES,

By its attorneys,

/s/ Michael E. Swain

Michael E. Swain, Esq. (BBO#676513)

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DATE: September 10, 2019

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**CERTIFICATE OF SERVICE**

I, Michael E. Swain, Esq. of the law firm of Sassoon & Cymrot, LLP, hereby certify that I have this 10th day of September 2019 served on behalf of U.S. Bank Trust National Association as Trustee of the Tiki Series III Trust as serviced by BSI Financial Services, an Response to Debtor's Objection to Notice of Payment Change and Motion to Determine and this Certificate of Service by causing copies hereof to be sent by electronic mail via the Case Management / Electronic Case Files (ECF) system, and by first-class U.S. mail (M) to all parties not appearing electronically but entitled to service, per the Federal Rules of Bankruptcy Procedure.

Joanne M. Sullivan 21 Brooksweld Road Canton, MA 02021 (M)	Elaine M. Benkoski East Brook Executive Park 30 Eastbrook Road, Suite 301 Dedham, MA 02026 (ECF)
John Fitzgerald Office of US. Trustee J.W. McCormack Post Office & Courthouse 5 Post Office Sq., 10th Fl, Suite 1000 Boston, MA 02109 (ECF)	Carolyn Bankowski-13 Chapter 13 Trustee Boston P. O. Box 8250 Boston, MA 02114 (ECF)

/s/ Michael E. Swain, Esq.  
Michael E. Swain, Esq.